

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

.....X  
PATRICIA COHEN,

*Plaintiff,*

-against-

STEVEN COHEN, DONALD COHEN, and  
BRETT LURIE,

*Defendants.*  
.....X

Hon. William H. Pauley III

No. 09 CV 10230 (WHP)

**ECF Case**

**ORAL ARGUMENT REQUESTED**

**DECLARATION OF MARTIN KLOTZ**

Martin Klotz declares pursuant to 28 U.S.C. § 1746:

1. I am a member of the law firm Willkie Farr & Gallagher LLP, which represents Steven Cohen and Donald Cohen ("Defendants") in the above-captioned action. I submit this declaration in support of Defendants' renewed motion to dismiss the Second Amended Complaint.

2. Attached hereto as Exhibit A is a true and correct copy of Plaintiff's Third Amended Complaint, dated September 30, 2013.

3. Attached hereto as Exhibit B is a true and correct copy of the Stipulation of Settlement and Separation Agreement between Patricia Cohen and Steven Cohen (without exhibits), dated December 15, 1989, filed in *Cohen v. Cohen*, Index No. 62593/90 (N.Y. Supreme Court).

4. Attached hereto as Exhibit C is a true and correct copy of the Judgment of Divorce, dated March 13, 1990, by Justice Walter Schackman in *Cohen v. Cohen*, Index No. 62593/90 (N.Y. Supreme Court).

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5. Attached hereto as Exhibit D is a true and correct copy of the Statement of Financial Condition of Mr. and Mrs. Cohen, as of July 1, 1988, filed in *Cohen v. Cohen*, Index No. 62593/90 (N.Y. Supreme Court).

6. Attached hereto as Exhibit E is a true and correct copy of the Order to Show Cause for Modification Upward of Child Support and Maintenance (without exhibits), dated March 21, 1991, filed in *Cohen v. Cohen*, Index No. 62593/90 (N.Y. Supreme Court).

7. Attached hereto as Exhibit F is a true and correct copy of the Affidavit of Patricia Cohen, dated March 20, 1991, filed in *Cohen v. Cohen*, Index No. 62593/90 (N.Y. Supreme Court).

8. Attached hereto a Exhibit G is a true and correct copy of the Reply Affirmation of Martin S. Kera, dated May 8, 1991, filed in *Cohen v. Cohen*, Index No. 62593/90 (N.Y. Supreme Court).

9. Attached hereto as Exhibit H is a true and correct copy of an Order, dated August 6, 1991, by Justice Walter Schackman in *Cohen v. Cohen*, Index No. 62593/90 (N.Y. Supreme Court).

10. Attached hereto as Exhibit I is a true and correct copy of the Amendment to Stipulation of Settlement and Separation Agreement Between Steven A. Cohen and Patricia Cohen (without exhibits), executed on January 6, 1992, filed in *Cohen v. Cohen*, Index No. 62593/90 (N.Y. Supreme Court).

11. Attached hereto as Exhibit J is a true and correct copy of Plaintiff's First Amended Complaint, dated April 5, 2010.

12. Attached hereto as Exhibit K is a true and correct copy of Plaintiff's Complaint Under the Racketeer Influenced and Corrupt Organizations Act, dated December 9, 2009.

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 16, 2013.

  
Martin Klotz